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*Attorneys for Defendants*

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

EDEN TREATMENT, LLC, a Nevada limited liability company; IGNITE TEEN TREATMENT, LLC, a Nevada limited liability company;

Plaintiffs,

vs.

ROCKY MOUNTAIN HOSPITAL AND MEDICAL SERVICES, INC., a Colorado Corporation; HMO COLORADO, INC., a Colorado Corporation; CARELON BEHAVIORAL CARE, INC., Delaware Corporation; CARELON BEHAVIORAL HEALTH, INC., a Virginia Corporation; CARELON HEALTH OF NEVADA, INC., a Nevada Corporation; THE ELEVANCE HEALTH COMPANIES, INC., an Indiana Corporation; DOES 1-10, business entities, forms unknown; DOES 11-20, individuals; and DOES 21-30, inclusive,

Defendants.

Case No. 2:24-cv-2257-RFB-MDC

**STIPULATION AND ORDER  
 EXTENDING DEFENDANTS' TIME  
 TO FILE REPLY IN SUPPORT OF  
 THEIR MOTION TO STAY  
 DISCOVERY, OR IN THE  
 ALTERNATIVE, FOR A  
 PROTECTIVE ORDER**

**(First Request)**

PLEASE TAKE NOTICE that the Parties, Defendants Rocky Mountain Hospital and Medical Service, Inc. dba Anthem Blue Cross and Blue Shield ("Rocky Mountain"), incorrectly named as Rocky Mountain Hospital and Medical Services, Inc., HMO Colorado Inc. dba HMO

Nevada (“HMO Colorado”), The Elevance Health Companies, Inc. (“Elevance”), Carelon Behavioral Care, Inc. (“Carelon BC”), Carelon Behavioral Health, Inc. (“Carelon BH”), and Carelon Health of Nevada, Inc. (“Carelon NV”) (collectively, “Defendants”), by and through their counsel of record, Tamara Beatty Peterson, Esq. of PETERSON BAKER, PLLC and Thomas C. Hardy, Esq. of REED SMITH LLP, and Plaintiffs Eden Treatment, LLC’s (“Eden”) and Ignite Teen Treatment, LLC’s (“Ignite”) (collectively, “Plaintiffs”) (together with Defendants, the “Parties”), by and through their counsel of record, Mark H. Hutchings, Esq. and John B. Lanning, Esq. of HUTCHINGS LAW GROUP, hereby stipulate and agree, subject to the Court’s approval, to extend the deadline for Defendants to file their reply in support of their Motion to Stay Discovery, or in the Alternative, for a Protective Order (“Motion to Stay”) [ECF No. 36] from May 27, 2025 to June 3, 2025.

1. On May 6, 2025, Defendants filed their Motion to Stay. *See* ECF No. 36.

2. Plaintiffs responded to the Motion to Stay on May 20, 2025. *See* ECF No. 38.

3. Currently, pursuant to LR 7-2(b), Defendants’ deadline to file a reply in support of the Motion to Stay is May 27, 2025.

4. The Parties stipulate that the deadline for Defendants to file a reply in support of the Motion to Stay be extended by seven (7) days, up to and including June 3, 2025.

5. Defendants seek this extension not for the purposes of delay, but for good cause and so that justice may be served. Defendants’ representatives are out of the office during the week of May 19, 2025, and the day before the deadline to file the reply is a federal holiday. As a result, Defendants’ ability to prepare and timely file a reply in support of its Motion to Stay is impaired.

6. No party will be prejudiced by the requested extension, nor will the extension unduly burden the Court.

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7. This is the first stipulation of time seeking an extension of time for Defendants to file a reply to the Motion to Stay.

Submitted by:

Approved as to content by:

DATED: May 23, 2025

DATED: May 23, 2025

PETERSON BAKER, PLLC

HUTCHINGS LAW GROUP

/s/ Tamara Beatty Peterson

/s/ Mark H. Hutchings

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*Attorneys for Defendants*

IT IS SO ORDERED.

Hon. Maximiliano D. Conville III

United States Magistrate Judge

DATED: 5/27/2025

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